

# MUKASEY FRENCHMAN LLP

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August 15, 2023

**VIA ECF**

The Honorable Edgardo Ramos  
United States District Judge  
United States Courthouse  
40 Foley Square  
New York, New York 10007

**Re: *United States v. Milton*, S1 21 Cr. 478 (ER)**

Dear Judge Ramos:

This letter is respectfully submitted to request an adjournment of Trevor Milton's sentencing, which is currently set for September 22, 2023. As previously raised with the Court (ECF 283), we have a working agreement with the government pursuant to which they will provide us with their position on loss amount and loss calculation under §2B1.1. Thereafter, the defense will be able to formulate a response, such that each party will be able to properly brief this critical issue. We have not yet received the government's position on loss amount. We, therefore, request an adjournment until the week of November 27, 2023. The government has no objection to this request.

Should the Court grant this request, the defense would agree to file its written submission two weeks before the sentencing date, and the government would file its brief one week later.

Thank you for your consideration of this submission.

Respectfully submitted,

/s/ Marc L. Mukasey  
Marc L. Mukasey

*Counsel for Defendant Trevor Milton*

cc: All Counsel (by ECF)